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DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

September 2013 Grand Jury

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Case No. 14CR2253-DMS

I N D I C T M E N T  
(2<sup>nd</sup> Superseding)

Title 18, U.S.C., Secs. 1956(h) - Conspiracy to Launder Monetary Instruments; Title 21, U.S.C., Secs. 959, 960, and 963 - Conspiracy to Distribute Cocaine Intended for Importation; Title 21, U.S.C., Secs. 952, 960, and 963 - Conspiracy to Import Cocaine and Methamphetamine; Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute Cocaine and Methamphetamine; Title 18, U.S.C., Sec. 371 - Conspiracy; Title 31, U.S.C., Sec. 5332 - Bulk Cash Smuggling Conspiracy; Title 31, U.S.C., Sec. 5324 - Structuring Conspiracy; Title 21, U.S.C., Secs. 959, 960, and 963 - Conspiracy to Manufacture and Distribute Methamphetamine and Heroin Intended for Importation; Title 18, U.S.C., Sec. 982, Title 21, U.S.C., Sec. 853, and Title 31, U.S.C., Secs. 5317(c) and 5332(b) - Criminal Forfeiture

ESEQUIEL OLIVAS-CHAIDEZ (5),  
aka "Copoya,"

ROMEO ALFONSO  
SALGUERIO-RETAMOZA (9),  
aka "Romeo,"

MARIA GUADALUPE ZAVALA (12),  
aka "Linda,"

DEZ:nlv:San Diego:3/6/15  
imp

I hereby attest and certify on  
That the foregoing document is a full, true and correct  
copy of the original on file in my office and in my legal  
custody.

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

By Deputy

1 JUAN LNU (14),  
aka "Miguel Damian-Serroblanco,"  
2 ALEX VILLEGAS (15),  
aka "Vale,"  
3 IRIS ROBERTS (16)  
4 [REDACTED]  
5 EUSEVIO ORTIZ-AISPURO (19),  
aka "Las Flechas,"  
6 aka "Chevo,"

7 Defendants.

8 The grand jury charges:

9 Count 1

10 Conspiracy to Launder Monetary Instruments

11 Beginning on a date unknown to the grand jury and continuing up  
12 to and including September 9, 2014, within the Southern District of  
13 California and elsewhere, defendants [REDACTED]

14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED] ESEQUIEL OLIVAS-CHAIDEZ, aka "Copoya," [REDACTED]

18 [REDACTED]  
19 ROMEO ALFONSO SALGUERIO-RETAMOZA, aka "Romeo," [REDACTED]

20 [REDACTED] Juan LNU,  
21 aka "Miguel Damian-Serroblanco, and EUSEVIO ORTIZ-AISPURO, aka "Las  
22 Flechas," aka "Chevo," did knowingly and intentionally conspire with  
23 each other and with other persons known and unknown to the grand jury  
24 to commit offenses against the United States, to wit:

25 a. to knowingly conduct and attempt to conduct a financial  
26 transaction affecting interstate and foreign commerce, which involved  
27 the proceeds of a specified unlawful activity, that is narcotics  
28 distribution, with the intent to promote the carrying on of specified

1 unlawful activity, that is narcotics distribution, and that while  
2 conducting and attempting to conduct such financial transaction knew  
3 that the property involved in the financial transaction represented  
4 the proceeds of some form of unlawful activity in violation of  
5 Title 18, United States Code, Section 1956(a)(1)(A)(i); and

6           b. to knowingly conduct and attempt to conduct financial  
7 transactions affecting interstate commerce and foreign commerce, which  
8 transactions involved the proceeds of specified unlawful activity,  
9 that is, narcotics distribution, knowing that the transactions were  
10 designed in whole or in part to conceal and disguise the nature,  
11 location, source, ownership, and control of the proceeds of specified  
12 unlawful activity, and that while conducting and attempting to conduct  
13 such financial transactions, knew that the property involved in the  
14 financial transactions represented the proceeds of some form of  
15 unlawful activity, in violation of Title 18, United States Code,  
16 Section 1956(a)(1)(B)(i); and

17           c. to knowingly conduct and attempt to conduct financial  
18 transactions affecting interstate commerce and foreign commerce, which  
19 transactions involved the proceeds of specified unlawful activity,  
20 that is, narcotics distribution, knowing that the transaction was  
21 designed in whole and in part to avoid a transaction reporting  
22 requirement under Federal law, and that while conducting and  
23 attempting to conduct such financial transaction knew that the  
24 property involved in the financial transaction, represented the  
25 proceeds of some form of unlawful activity, in violation of Title 18,  
26 United States Code, Section 1956(a)(1)(B)(ii); and

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1 d. to transport, transmit and transfer and attempt to  
2 transport, transmit and transfer a monetary instrument and funds from  
3 a place in the United States to and through a place outside the United  
4 States with the intent to promote the carrying on of specified  
5 unlawful activity, that is, narcotics distribution, in violation of  
6 Title 18, United States Code, Section 1956(a)(2)(A); and

7 e. to transport, transmit, and transfer, and attempt to  
8 transport, transmit, and transfer a monetary instrument or funds from  
9 a place in the United States to or through a place outside the United  
10 States, knowing that the funds involved in the transportation,  
11 transmission, and transfer represented the proceeds of some form of  
12 unlawful activity and knowing that such transportation, transmission,  
13 and transfer was designed in whole or in part to conceal and disguise  
14 the nature, location, source, ownership, and control of the proceeds  
15 of specified unlawful activity, in violation of Title 18, United  
16 States Code, Section 1956(a)(2)(B)(i);

17 All in violation of Title 18, United States Code, Section 1956(h).

18 Count 2

19 Conspiracy to Distribute Cocaine Outside the United States

20 Beginning on a date unknown to the grand jury and continuing up  
21 to and including September 9, 2014, defendants [REDACTED]

22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED] did knowingly  
26 and intentionally conspire with each other, and with other persons  
27 known and unknown to the grand jury, to distribute and cause the  
28 distribution of 5 kilograms and more of cocaine, a Schedule II

Controlled Substance, intending and knowing that such cocaine would be unlawfully imported into the United States; all in violation of Title 21, United States Code, Sections 959, 960, and 963.

Count 3

Conspiracy to Import Cocaine

Beginning on a date unknown to the grand jury and continuing up to and including September 9, 2014 within the Southern District of California, and elsewhere, defendants [REDACTED]

[REDACTED] ESEQUIEL OLIVAS-CHAIDEZ, aka "Copoya," [REDACTED]

[REDACTED] ROMEO ALFONSO SALGUERIO-RETAMOZA, aka "Romeo," [REDACTED]

[REDACTED] JUAN LNU, aka "Miguel Damian-Serroblanco," ALEX VILLEGAS, aka "Vale," and IRIS ROBERTS, did knowingly and intentionally conspire with each other, and with other persons known and unknown to the grand jury, to import 5 kilograms and more of cocaine, a Schedule II Controlled Substance into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952, 960, and 963.

Count 4

Conspiracy to Distribute Cocaine

Beginning on a date unknown to the grand jury and continuing up to and including August 8, 2014, within the Southern District of California, and elsewhere, defendants [REDACTED]

[REDACTED] ESEQUIEL OLIVAS-CHAIDEZ, aka "Copoya," [REDACTED]

1 [REDACTED] ROMEO ALFONSO SALGUERIO-RETAMOZA,  
2 aka "Romeo," [REDACTED]  
3 [REDACTED] JUAN LNU, aka "Miguel Damian-Serroblanco," ALEX  
4 VILLEGAS, aka "Vale," and IRIS ROBERTS, and did knowingly and  
5 intentionally conspire with other persons known and unknown to the  
6 grand jury, to distribute, and possess with the intent to distribute  
7 5 kilograms or more of cocaine, a Schedule II Controlled Substance; in  
8 violation of Title 21, United States Code, Sections 841(a)(1) and 846.

9 Count 5

10 Conspiracy to Import Methamphetamine

11 Beginning on a date unknown to the grand jury and continuing up  
12 to and including August 8, 2014, within the Southern District of  
13 California, and elsewhere, defendants [REDACTED]

14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED] ROMEO  
17 ALFONSO SALGUERIO-RETAMOZA, aka "Romeo," [REDACTED]  
18 [REDACTED] ALEX VILLEGAS,  
19 aka "Vale," and IRIS ROBERTS, did knowingly and intentionally conspire  
20 with each other, and with other persons known and unknown to the grand  
21 jury, to import 500 grams and more of a mixture and substance  
22 containing a detectable amount of methamphetamine; into the United  
23 States from a place outside thereof; in violation of Title 21, United  
24 States Code, Sections 952, 960, and 963.

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Count 6Conspiracy to Distribute Methamphetamine

Beginning on a date unknown to the grand jury and continuing up to and including September 9, 2014, within the Southern District of California, and elsewhere, defendants [REDACTED]

[REDACTED] ROMEO ALFONSO SALGUERIO-RETAMOZA, aka "Romeo," [REDACTED]

[REDACTED] ALEX VILLEGAS, aka "Vale," and IRIS ROBERTS did knowingly and intentionally conspire with other persons known and unknown to the grand jury, to manufacture, distribute, and dispense 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Count 7Bulk Cash Smuggling Conspiracy

Beginning on a date unknown to the grand jury and continuing up to and including September 9, 2014, within the Southern District of California defendants [REDACTED]

[REDACTED] did knowingly and intentionally conspire to commit offenses against the United States, to wit: to knowingly conceal more than \$10,000 in U.S. currency in a conveyance, article of luggage, merchandise and container and to transport and attempt to transport and transfer such U.S. currency or monetary instruments from a place within the United States to a place outside the United States with the intent to evade a currency

1 reporting requirement under Title 31, United States Code,  
2 Section 5316, in violation of Title 31, United States Code,  
3 Section 5332; all in violation of Title 18 United States Code,  
4 Section 371.

5 Count 8

6 Conspiracy to Structure Financial Transactions

7 Beginning on a date unknown to the grand jury and continuing up  
8 to and including September 9, 2014, within the Southern District of  
9 California, and elsewhere, defendants ROMEO ALFONSO SALGUERIO-  
10 RETAMOZA, aka "Romeo," [REDACTED] and  
11 MARIA GUADALUPE ZAVALA, aka "Linda," did knowingly and intentionally  
12 conspire to commit offenses against the United States, to wit:  
13 Structuring of financial transactions, in violation of Title 31,  
14 United States Code, Section 5324(a)(3) and (d), Title 31, United  
15 States Code, Section 5313(a), and Title 31, Code of Federal  
16 Regulations, Section 1010.311; in violation of Title 31, United States  
17 Code, Section 5324.

18 Overt Acts of Structuring Conspiracy

19 The following overt acts, among others, were committed within the  
20 Southern District of California, and elsewhere, in furtherance of the  
21 structuring conspiracy.

22 a. On or about March 21, 2013, defendant SALGUERIO-  
23 RETAMOZA sent an electronic message to defendant [REDACTED]  
24 requesting "Wells Fargo" accounts to deposit \$100,000. Defendant  
25 [REDACTED] responded, by electronic message, and provided four  
26 account names and numbers for Wells Fargo accounts in San Diego and  
27 Imperial Counties. [REDACTED] also gave instructions to deposit  
28 \$15,000 into each account.



1           b. On or about the week of March 21, 2013, unidentified  
2 co-conspirators deposited \$15,000 into each of the accounts provided  
3 by defendant [REDACTED] to defendant SALGUERIO-RETAMOZA. The  
4 deposits were made at numerous Wells Fargo bank branches in the  
5 Minneapolis, MN area, and none of the individual deposits were greater  
6 than \$10,000.

7           c. On or about April 9, 2013, defendant [REDACTED] sent  
8 an electronic message to defendant SALGUERIO-RETAMOZA requesting an  
9 "itemization." SALGUERIO-RETAMOZA responded with an electronic  
10 message summarizing a total of 15 deposits, each less than \$10,000,  
11 into the bank accounts SALGUERIO-RETAMOZA had provided earlier.

12           d. Throughout March and April 2013, unidentified co-  
13 conspirators made a total of 52 deposits, totaling \$298,640, into  
14 accounts provided by defendant [REDACTED] to defendant SALGUERIO-  
15 RETAMOZA by electronic message. All of these 52 deposits were made in  
16 amounts less than \$10,000.

17           e. On or about March 21, 2013, defendant GUADALUPE ZAVALA  
18 sent an electronic message to defendant SALGUERIO-RETAMOZA, providing  
19 him with three bank account names and numbers, and instructing him to  
20 make deposits of \$8200 into each. That same day, an unindicted co-  
21 conspirator made a deposit of \$8200 into each of the tree accounts.

22           f. On or about April and May, 2013, defendant GUADALUPE  
23 ZAVALA provided defendant SALGUERIO-RETAMOZA, by electronic message,  
24 with a series of additional bank account names and numbers.  
25 Unindicted co-conspirators, including Jose Ceden Bacerra, then made  
26 multiple cash deposits, each under \$10,000, into the accounts.

27           g. On August 22, 2013, defendant SALGUERIO-RETAMOZA sent  
28 an electronic message to a co-conspirator, in which he provided the

1 Wells Fargo business account number for a company called "USA  
2 Imports." SALGUERIO-RETAMOZA also provided instructions to divide up  
3 a deposit of \$25,000 into four or five individual deposits. In the  
4 days immediately afterwards, unidentified co-conspirators made five  
5 cash deposits into the USA Imports account, all for less than \$10,000.

6 h. On November 5, 2013, defendant SALGUERIO-RETAMOZA sent  
7 an electronic message to a co-conspirator, in which he provided the  
8 Wells Fargo account information for the business account of a company  
9 called "Simple Trading." SALGUERIO-RETAMOZA provided instructions not  
10 to deposit \$10,000, but to only make a deposit of \$8500 into the  
11 account. That same day, a co-conspirator deposited \$8500 into the  
12 account, and SALGUERIO-RETAMOZA received an electronic communication  
13 with a photograph of the deposit slip.

14 i. Over the course of November 2013, additional  
15 unidentified co-conspirators made multiple deposits into the Simple  
16 Trading account in amounts less than \$10,000.

17 j. In addition to the overt acts outlined above,  
18 SALGUERIO-RETAMOZA, [REDACTED] and GUADALUPE ZAVALA exchanged  
19 thousands of electronic messages over the course of 2013, in which  
20 they discussed deposits into multiple bank accounts. Unidentified co-  
21 conspirators then made structured cash deposits, totaling more than  
22 \$4 million, into the accounts discussed by the defendants.  
23 All in violation of Title 18, United States Code, Section 371.

24 Count 9

25 Conspiracy to Manufacture Methamphetamine Outside the United States

26 Beginning on a date unknown to the grand jury and continuing up  
27 to and including September 9, 2014, defendant EUSEVIO ORTIZ-AISPURO,  
28 aka "Las Flechas," aka "Chevo," did knowingly and intentionally

1 conspire with other persons known and unknown to the grand jury, to  
2 manufacture and distribute and cause the manufacture and distribution  
3 of 500 grams and more of a mixture and substance containing a  
4 detectable amount of methamphetamine, a Schedule II Controlled  
5 Substance, intending and knowing that such methamphetamine would be  
6 unlawfully imported into the United States; all in violation of  
7 Title 21, United States Code, Sections 959, 960, and 963.

8 Count 10

9 Conspiracy to Manufacture Heroin Outside the United States

10 Beginning on a date unknown to the grand jury and continuing up  
11 to and including September 9, 2014, defendant EUSEVIO ORTIZ-AISPURO,  
12 aka "Las Flechas," aka "Chevo," did knowingly and intentionally  
13 conspire with other persons known and unknown to the grand jury, to  
14 manufacture and distribute and cause the manufacture and distribution  
15 of 1 kilogram and more of heroin, a Schedule I Controlled Substance,  
16 intending and knowing that such heroin would be unlawfully imported  
17 into the United States; all in violation of Title 21, United States  
18 Code, Sections 959, 960, and 963.

19 Criminal Forfeiture Allegations

20 1. The allegations contained in Counts 1 through 10 of this  
21 Indictment are realleged and by reference fully incorporated herein  
22 for the purpose of alleging forfeiture to the United States of America  
23 pursuant to the provisions of Title 21, United States Code,  
24 Section 853, Title 18, United States Code, Section 982, and Title 31,  
25 United States Code, Sections 5317 and 5332.

26 2. As a result of the commission of the felony offense alleged  
27 in Count 1 of this Indictment, and pursuant to Title 18, United States  
28 Code, Section 982(a)(1), defendants [REDACTED]



1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED] ESEQUIEL OLIVAS-CHAIDEZ, aka "Copoya," [REDACTED]

5 [REDACTED]  
6 ROMEO ALFONSO SALGUERIO-RETAMOZA, aka "Romeo," [REDACTED]

7 [REDACTED] MARIA GUADALUPE ZAVALA, aka "Linda," [REDACTED]

8 [REDACTED] Juan LNU, aka "Miguel Damian-Serroblanco,  
9 and EUSEVIO ORTIZ-AISPURO, aka "Las Flechas," aka "Chevo," shall, upon  
10 conviction, forfeit to the United States all rights, title and  
11 interest in any and all property involved in such offense, and any  
12 property traceable to such property. The properties subject to  
13 forfeiture include, but are not limited to the following:

- 14 a. \$62,615 seized from Wells Fargo bank account number  
15 XXXXXX1162 in the name of Jorge A. Zamano;  
16 b. \$22,575.18 seized from Wells Fargo bank account number  
17 XXXXXX3143 in the name of Jose E. Castellanos;  
18 c. \$26,420 seized from Wells Fargo bank account number  
19 XXXXXX9524 in the name of Jose E. Castellanos;  
20 d. \$43,744.10 seized from Wells Fargo bank account number  
21 XXXXXX9563, in the name of Irma C. Samano;  
22 e. \$34,568.03 seized from Wells Fargo bank account number  
23 XXXXXX1616 in the name of Jesus Cortez-Ruiz;  
24 f. \$11,646.37 seized from Wells Fargo bank account number  
25 XXXXXX2828 in the name of Alberto Quinones;  
26 g. \$44,998.40 seized from Wells Fargo bank account number  
27 XXXXXX7694 in the name of Susana Salgado.

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1        3. As a result of the commission of the felony offense alleged  
2 in Counts 2 through 6, and 9 and 10 of this Indictment, said  
3 violations being punishable by imprisonment for more than one year,  
4 and pursuant to Title 21, United States Code, Section 853(a),  
5 defendants [REDACTED]

6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 ESEQUIEL OLIVAS-CHAIDEZ, aka "Copoya," [REDACTED]

10 [REDACTED]  
11 [REDACTED] ROMEO ALFONSO SALGUERIO-RETAMOZA, aka "Romeo," [REDACTED]  
12 [REDACTED]

13 JUAN LNU, aka "Miguel Damian-Serroblanco," ALEX VILLEGAS, aka "Vale,"  
14 IRIS ROBERTS, and EUSEVIO ORTIZ-AISPURO, aka "Las Flechas"  
15 aka "Chevo," shall forfeit to the United States any property  
16 constituting or derived from, proceeds traceable to such offenses,  
17 including but not limited to a sum of money equal to the total amount  
18 of proceeds obtained directly or indirectly as a result of the  
19 offenses, and all property used or intended to be used to commit or to  
20 facilitate the commission of the violations.

21        4. As a result of the commission of the felony offense alleged  
22 in Count 7 of this Indictment, and pursuant to Title 31, United States  
23 Code, Section 5332(b) defendants [REDACTED]

24 [REDACTED] and [REDACTED] shall  
25 forfeit to the United States all property, real and personal involved  
26 in the offense and all property traceable to such property.

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1        5. As a result of the commission of the felony offense alleged  
2 in Count 8 of this Indictment, and pursuant to Title 31, United States  
3 Code, Section 5317(c), defendants ROMEO ALFONSO SALGUERIO-RETAMOZA,  
4 aka "Romeo," [REDACTED] and MARIA  
5 GUADALUPE ZAVALA, aka "Linda," shall forfeit to the United States all  
6 property, real and personal involved in the offense and all property  
7 traceable to such property. The properties subject to forfeiture  
8 include, but are not limited to, the following:

- 9        a. \$62,615 seized from Wells Fargo bank account number  
10        XXXXXX1162 in the name of Jorge A. Zamano;
- 11        b. \$22,575.18 seized from Wells Fargo bank account number  
12        XXXXXX3143 in the name of Jose E. Castellanos;
- 13        c. \$26,420 seized from Wells Fargo bank account number  
14        XXXXXX9524 in the name of Jose E. Castellanos;
- 15        d. \$43,744.10 seized from Wells Fargo bank account number  
16        XXXXXX9563, in the name of Irma C. Samano;
- 17        e. \$34,568.03 seized from Wells Fargo bank account number  
18        XXXXXX1616 in the name of Jesus Cortez-Ruiz;
- 19        f. \$11,646.37 seized from Wells Fargo bank account number  
20        XXXXXX2828 in the name of Alberto Quinones;
- 21        g. \$44,998.40 seized from Wells Fargo bank account number  
22        XXXXXX7694 in the name of Susana Salgado.

23        6. If any of the above-described forfeitable property, as a  
24 result of any act or omission of the defendants:

- 25        a. cannot be located upon the exercise of due diligence;
- 26        b. has been transferred or sold to, or deposited with, a  
27        third party;
- 28        c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

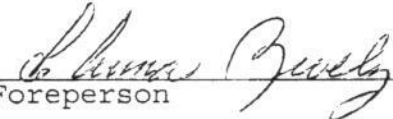


e. has been commingled with other property which cannot be subdivided without difficulty;  
 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), Title 18 United States Code, Section 982(b), Title 31, United States Code, Sections 5332(b) and 5317(c), to seek forfeiture of any other property of the defendants up to the value of the said property listed above as being subject to forfeiture.


All in violation of Title 21, United States Code, Section 853, and Title 18, United States Code, Section 982 and Title 31, United States Code, Sections 5317 and 5332. (c)-NEU (b) -NEU

DATED: March 6, 2015.

A TRUE BILL:

  
 Foreperson

LAURA E. DUFFY  
 United States Attorney

By:   
 DANIEL E. ZIPP  
 Assistant U.S. Attorney

I hereby attest and certify on 3/6/2015  
 That the foregoing document is a full, true and correct copy of the original on file in my office and in my custody.

CLERK, U.S. DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA

By:  Deputy